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**From:** O'Brien, Elisabeth (DPH)  
**Sent:** Friday, December 18, 2009 11:16 AM  
**To:** Nassif, Julianne (DPH)  
**Subject:** RE: Affidavit OK?  
**Attachments:** Substitute Expert Affidavit - Della C. Saunders.doc

Julie,

I am attaching a draft affidavit for Della. You will see that some of the wording has been carefully edited. Chuck has also had a chance to review it. Hope it will work....

Betsy

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**From:** Nassif, Julianne (DPH)  
**Sent:** Tuesday, December 15, 2009 10:07 AM  
**To:** O'Brien, Elisabeth (DPH)  
**Subject:** FW: Affidavit OK?

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**From:** Grossman, John (EPS)  
**Sent:** Friday, November 20, 2009 3:52 PM  
**To:** Nassif, Julianne (DPH)  
**Subject:** Fw: Affidavit OK?

Have you looked at this. Will it work for you w small adjustments?  
John A. Grossman  
Undersecretary of Forensic Sciences and Technology  
Executive Office of Public Safety and Security  
(Sent from my Blackberry)

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**From:** Williams, Geline (DAA)  
**To:** DAA-DL-Melendez-Diaz  
**Cc:** Grossman, John (EPS); Nassif, Julianne (DPH)  
**Sent:** Fri Nov 20 15:49:05 2009  
**Subject:** Affidavit OK?

To the M-D experts:

Several weeks ago I sent to you this EOPSS draft affidavit to support a motion for a substitute chemist (cocaine). Please let me know immediately if you have any critique/improvements to suggest; EOPSS will then prepare several similar documents for other drugs and I will ask John Grossman if he can give us an ETA for those.

The DPH lab director is now receiving summonses for long-retired/moved chemists; the DPH does not have the resources to produce these witnesses *or to retest the drugs*. Accordingly, it is imperative to get these affidavits posted on MDAA net ASAP to help all prosecutors litigate these cases.

Thanks.

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